

**Federal Defenders  
OF NEW YORK, INC.**

Southern District  
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December 3, 2024

**By ECF**

Honorable Gregory H. Woods  
United States District Judge  
Southern District of New York  
500 Pearl Street  
New York, New York 10007

USDC SDNY
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**MEMORANDUM ENDORSED**

**Re: *United States v. Jason Johnson*, 24 Cr. 131 (GHW)**

Dear Judge Woods:

I write with the Government's consent to respectfully request an adjournment of the pretrial filing deadlines set forth in the Court's September 4, 2024, Order. ECF No. 22. The proposed adjournment would facilitate the parties' continued efforts at a pretrial resolution by allowing Mr. Johnson sufficient time to consider a plea offer from the Government that we understand to be forthcoming.

The current and proposed deadlines are as follows:

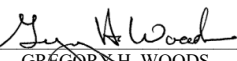
<b>Filing</b>	<b>Current Deadline</b>	<b>Proposed Deadline</b>
Def.'s pretrial motions	Dec. 9, 2024	Dec. 23, 2024
Govt.'s opposition to defense motions	Dec. 30, 2024	Jan. 13, 2025
Def.'s replies	Jan. 6, 2025	Jan. 20, 2025
Govt. expert disclosures	Jan. 13, 2025	Feb. 10, 2025
Def. expert disclosures	Jan. 27, 2025	Feb. 17, 2025
Motions <i>in limine</i>	Feb. 10, 2025	Feb. 24, 2025
Oppositions to motions <i>in limine</i>	Feb. 17, 2025	Mar. 3, 2025
Replies to motions <i>in limine</i>	Feb. 21, 2025	Mar. 7, 2025

Adopting this schedule would not necessitate any change to the current April 7, 2025, trial date, through which time has been excluded from the Speedy Trial Clock. Thank you for your consideration of this request.

Application granted. The Defendant's December 3, 2024 request for an extension of time to submit the pretrial filings detailed in the Court's September 4, 2024 Order, Dkt. No. 23, is granted. The Court adopts each of the Defendant's proposed deadlines. The Clerk of Court is directed to terminate the motion pending at Dkt. No. 23.

SO ORDERED.

Dated: December 3, 2024  
New York, New York

  
GREGORY H. WOODS  
United States District Judge

cc: AUSA Justin Horton

Sincerely,

Ariel Werner  
Assistant Federal Defender  
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